

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

HERITAGE HOME GROUP, LLC, *et al.*,¹

Debtors.

ALFRED T. GIULIANO, in his capacity as
Chapter 7 Trustee of HERITAGE HOME
GROUP, LLC, *et al.*,

Plaintiff,

vs.

YANG MING (AMERICA) CORPORATION,

Defendant.

Chapter 7

Case No. 18-11736 (BLS)

(Jointly Administered)

Adversary Proceeding

Case No. 20-50692 (BLS)

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, Alfred T. Giuliano in his capacity as chapter 7 trustee of Heritage Home Group, LLC, *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and Yang Ming (America) Corporation (the “Defendant” together with Plaintiff, the “Parties”), enter into this *Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Defendant may answer, move, or otherwise plead in response to the *Complaint for Avoidance and Recovery of Preferential*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s tax identification numbers, are: Heritage Home Group LLC (9506); HH Global II B.V. (0165); HH Group Holdings US, Inc. (7206); HHG Real Property LLC (3221); and HHG Global Designs LLC (1150). The Debtors’ corporate headquarters was located at 1925 Eastchester Drive, High Point, North Carolina 27265.

Transfers Pursuant to 11 U.S.C. Sections 547 & 550 [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including September 3, 2020.

2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved. Additionally, the Parties reserve their rights to seek further extensions from the Court.

Dated: July 30, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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*Counsel to Plaintiff, Alfred T. Giuliano, chapter 7 Trustee
for the Estates of Heritage Home Group, LLC, et al.*

-and-

Dated: July 30, 2020

PRICE MEESE SHULMAN & D'ARMINO P.C.

/s/ Rick A. Steinberg

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